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Fighting for Employee Justice



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August 2, 2024

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

**Re: Competello v. Beauty Leaf Incorporated d/b/a Nikua Skin**  
**Case No. 24-cv-04970-JLR**

Dear Judge Rochon:

We represent Plaintiff Susan Competello (“Plaintiff”) in the above-referenced ADA matter against Defendant, Beauty Leaf Incorporated (“Defendant”), (collectively the “Parties”). We submit this letter in accordance with this Court’s Order issued on July 30, 2024 (ECF, Doc. 7).

As this Court noted, Plaintiff successfully served Defendant with the Summons and Complaint in this matter on July 5, 2024 (making the deadline to respond July 26, 2024) and filed the requisite Affidavit of Service on July 15. Thereafter, CEO Daniel Shafer of Defendant reached out via email to our firm and requested an additional two weeks to file their answer, as they needed additional time to obtain counsel, which we agreed to, making their deadline to respond August 9, 2024.

Accordingly, regarding next steps in this matter, Plaintiff proposes that Defendant be permitted to file their Answer by August 9, and if they fail to do so, Plaintiff will promptly move for issuance of Default. We are appreciative of the Court's consideration in this matter. Thank you.

**JOSEPH & NORINSBERG, LLC**

Sincerely,




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Defendant's deadline to respond to the complaint is extended to August 9, 2024 *nunc pro tunc*.

Dated: August 5, 2024  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge